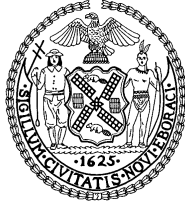


MEMO ENDORSED



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#:  
DATE FILED: 4/9/2025

MURIEL GOODE-TRUFANT  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

MARK D. ZUCKERMAN  
Senior Counsel  
E-mail: mzuckerm@law.nyc.gov  
Phone: (212) 356-3519  
Fax: (212) 788-9776

April 7, 2025

**VIA ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Raul de la Cruz v. City of New York, et. al., 24 Civ. 2289 (ALC)

Your Honor:

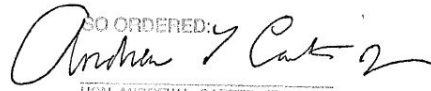
I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants in the above-referenced matter. The parties write jointly for an extension of time in connection with defendants' anticipated motion to dismiss. Defendants propose to file their motion by April 25, 2025 (instead of April 11, 2025). Plaintiff proposes to file his response by May 23, 2025. Defendants propose to file their reply by June 6, 2025. The requested extensions are for the reason that the parties need the additional time to fully address the important and numerous issues in connection with defendants' motion.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman  
Senior Counsel

cc: All Counsel (via ECF)

SO ORDERED:   
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

April 9, 2025  
New York, NY